

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat
Brown

**DECLARATION OF STEVE W. BERMAN
IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE
TO FILE FOURTH AMENDED COMPLAINT**

I, Steve W. Berman, declare as follows:

1. I am the Managing Partner of Hagens Berman Sobol Shapiro LLP and Co-Lead Counsel for the Plaintiffs in *In re: National Collegiate Athletic Association Student-Athlete Concussion Litigation*, No. 13-cv-09116 (N.D. Ill.). I have full knowledge of the matters stated herein, and could and would testify hereto if necessary.

2. Non-confidential documents are publicly filed as attachments beginning at Exhibit 1. Confidential documents are filed under seal as Exhibits 4-5.

3. Attached are true and correct copies of the following documents:

Ex.	Bates Numbers
1	NCAA00007964-7966
2	NCAA00014606-09
3	NCAA00003483-91
4	NCAA00001639-45
5	NCAA00013786-98

I declare under perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 14th day of April, 2015 at Seattle, Washington.

/s/ Steve W. Berman

Steve W. Berman

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on April 14, 2015, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Steve W. Berman